IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

N.H., et al.,

Plaintiffs,

JUDGE JOHN R. ADAMS

vs.

DYLAN SOISSON, et al.,

DEFENDANTS' STATUS REPORT

Now come Defendants Village of Lakemore and Dylan Soisson who provide the following Status Report regarding events between August 24, 2021 and October 8, 2021:

I. DISCOVERY

Defendants.

A. Discovery from Plaintiffs to Defendants

On this date, at 3:43 p.m., Defendants served the following discovery upon Plaintiff's counsel:

- 1. Defendant Soisson's Answers and Objections to Plaintiff's First Set of Interrogatories,
- 2. Defendant Soisson's Answers and Objections to Second Set of Interrogatories, and
- 3. Defendant Soisson's Answers and Objections to Responses to Plaintiff's First Request for Production of Documents to Soisson

Defendant Soisson's discovery responses to all of Plaintiff's written discovery is complete.

Regarding the Village's discovery responses, same will be served by October 12, 2021. In the transition between law firms, complete files were not transferred from counsel's former law firm to Hanna, Campbell & Powell, LLC. Undersigned counsel had to wait a considerable period of time to receive the files. Upon receipt, the body cam videos still were not provided and counsel had to request same be reproduced from the Village again. It should be noted that prior to filing suit, Plaintiffs' counsel had made a public records request to the Village for many of the same documents and the body cam videos he has requested in discovery.

B. Discovery to Plaintiffs from Defendants

On September 1, 2021, Defense Counsel served a Medical Authorization Release form upon Plaintiff's counsel.

On September 7, 2021, Plaintiff's counsel responded with a signed Medical Authorization Release form, which did not include N.H.'s home address, date of birth, last four digits of her SSN. That information was subsequently requested on September 8, 2021.

After Plaintiff's counsel supplied some, but not all, of the information requested, the Medical Authorization Release was forwarded to Akron Children's Hospital. To date, the medical providers have not responded to the records request.

II. SETTLEMENT DISCUSSIONS

None.

III. MOTIONS FILED/PENDING

None.

Respectfully submitted:

Jahn D. Latchney_

John D. Latchney (0046539) Hanna, Campbell & Powell, LLP 3737 Embassy Parkway, Suite 100 Akron, Ohio 44333

DID: (330) 670-7602 Cell: (440) 213-2016 Fax: (330) 670-7458

Email: jlatchney@hcplaw.net

Attorney for Defendants